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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**
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11 MTC FINANCIAL, INC. d.b.a. TRUSTEE
12 CORPS,

13 Plaintiff,

14 vs.

15 ANDREW E. ROTHBART; WELLS FARGO
BANK, N.A.; UNITED STATES OF AMERICA;
16 FIA CARD SERVICES, N.A.; DISCOVER
17 BANK; and REPUBLIC SILVER STATE
DISPOSAL, INC.

18 Defendants.
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Case No. 2:18-cv-01637-JCM-CWH

MOTION TO DISMISS

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1 Pursuant to Federal Rule of Civil Procedure 41(a)(2), MTC Financial, Inc. d.b.a. Trustee Corps
2 (“MTC”), by and through its undersigned counsel, hereby voluntarily dismisses the instant action,
3 without prejudice. Pursuant to the Stipulation filed on April 22, 2021, MTC has complied with the
4 terms stated therein and has paid the United States of America \$90,963.31.

5 Each party will bear its own attorneys’ fees, expenses, and costs.

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7 DATED: July 16, 2021

Respectfully Submitted,

8 MALCOLM ♦ CISNEROS, A Law Corporation

9 By: /s/ Nathan F. Smith
10 NATHAN F. SMITH
11 *Attorneys for MTC Financial, Inc. d.b.a. Trustee*
12 *Corps*

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14 IT IS SO ORDERED July 22, 2021.

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16 UNITED STATES DISTRICT JUDGE
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PROOF OF SERVICE

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action. My business address is 2112 Business Center Drive, Second Floor, Irvine, California 92612.

The foregoing document described as **MOTION TO DISMISS** will be served on the interested parties in this action as follows:

I. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF") - The foregoing document will be served by the court via NEF and hyperlink to the document. On July 16, 2021, I checked the mailing information for this case and the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses indicated below:

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on July 16, 2021, at Irvine, California.

/s/ Christina Valenzuela
Christina Valenzuela